

EXHIBIT E

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September 30, 2016

VIA E-MAIL

Marshall J. Mattera, Esq.
Baker & Hostetler LLP
45 Rockefeller Plaza
New York, NY 10111
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Re: Picard v. Ceretti, et al., Adv. Pro. No. 09-01161 (SMB)

Dear Mr. Mattera:

This will respond to your letters dated August 30 and September 21, 2016, respectively.

Tremont's Prior Productions

As you know, in our discussions, we have asked you to identify documents, if any, relevant to the *Ceretti* proceeding that Tremont did not previously produce to your client in prior litigation. Contrary to the suggestion in your August 30 letter, you still have not done so.

As for the "exemplars" attached to your August 30 letter, they are not relevant to the *Ceretti* proceeding. Moreover, those e-mails were not in Tremont's possession, custody or control as of December 11, 2008, which would explain why Tremont would not have produced them in any event had they been relevant and requested for production in any litigation post-dating Madoff's arrest. Consequently, we believe the exemplars provide no cause to suspect that Tremont has any relevant *Ceretti* documents in its files that were not previously produced to your client.

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New Searches

During our meet-and-confer on August 24, 2016, I explained that in addition to electronic documents, Tremont also has large quantities of hard copy material which, I can now confirm, fills over 1,200 banker's boxes. That material was reviewed at great expense and length more than seven years ago, and the relevant Madoff-related documents were identified and loaded onto an electronic database at that time. We have no reason to believe that re-searching those boxes today would uncover documents relevant to the *Ceretti* proceeding that Tremont has not already produced.

At the August 24 meet-and-confer, we also discussed and agreed to consider your proposal to quantify the number of hits generated through an electronic search of Tremont's e-mail utilizing the search terms identified in your July 25 letter. On further consideration, we used some, but not all, of your proposed search terms, with the following results:

- 1) "Ceretti" | 140 responsive e-mails/attachments
- 2) "Grosso" | 388 responsive e-mails/attachments
- 3) "Kigate" | 17,072 responsive e-mails/attachments
- 4) "Wetherhill" | 74 responsive e-mails/attachments
- 5) "Salahuddin" | 3,838 responsive e-mails/attachments
- 6) "Thomas" or "Tom" & "Healy" | 3,339 responsive e-mails/attachments
- 7) "Philip Evans" | 10 responsive e-mails/attachments

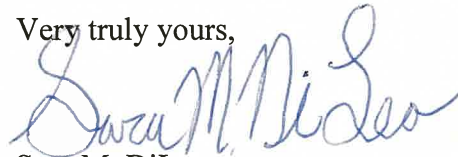
The total hit count for all of the foregoing, combined and de-duped, was 21,263 e-mails and 4,226 attachments.

We believe it is highly likely that most, if not all, of any relevant, responsive documents not previously produced by Tremont will be found among the "Ceretti," "Grosso," "Wetherhill" and "Philip Evans" documents we located on Tremont's e-mail server. We therefore have reviewed those documents and will be producing them to you next week to the extent they are responsive and non-privileged. Once you have had an opportunity to review those documents, we should schedule another meet-and-confer to discuss how we may streamline any additional search and

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review of the approximately 24,000 e-mails and attachments that hit for the "Kingate,"
"Salahuddin" and "Tom Healy" search terms.

Very truly yours,



Sara M. DiLeo

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